

Mr. Charlie Weber
Erler Industries
P. O. Box 219
North Vernon, IN 47265

Re: 079-16237
Minor Source Modification to:
Part 70 permit No.: T079-7572-00010

Dear Mr. Weber:

Erler Industries was issued Part 70 operating permit T079-7572-00010 on September 23, 1998 for the operation of a plastic and metal parts spray painting facility. An application to modify the source was received on July 23, 2002. Pursuant to 326 IAC 2-7-10.5 the following emission units are approved for construction at the source:

- (1) One (1) paint line, identified as Plant 3, Line 4, consisting of three (3) spray booths, identified as EU-19, EU-20, and EU-21, with a maximum capacity of 625 parts per hour total, equipped with HVLP spray equipment, controlled by fabric filters, exhausting through stacks identified as SV-19, SV-20, and SV-21.

The following construction conditions are applicable to the proposed project:

General Construction Conditions

1. The data and information supplied with the application shall be considered part of this source modification approval. Prior to any proposed change in construction which may affect the potential to emit (PTE) of the proposed project, the change must be approved by the Office of Air Quality (OAQ).
2. This approval to construct does not relieve the permittee of the responsibility to comply with the provisions of the Indiana Environmental Management Law (IC 13-11 through 13-20; 13-22 through 13-25; and 13-30), the Air Pollution Control Law (IC 13-17) and the rules promulgated thereunder, as well as other applicable local, state, and federal requirements.
3. Effective Date of the Permit
Pursuant to IC 13-15-5-3, this approval becomes effective upon its issuance.
4. Pursuant to 326 IAC 2-1.1-9 and 326 IAC 2-7-10.5(i), the Commissioner may revoke this approval if construction is not commenced within eighteen (18) months after receipt of this approval or if construction is suspended for a continuous period of one (1) year or more.
5. All requirements and conditions of this construction approval shall remain in effect unless modified in a manner consistent with procedures established pursuant to 326 IAC 2.

6. Pursuant to 326 IAC 2-7-10.5(l) the emission units constructed under this approval shall not be placed into operation prior to revision of the source's Part 70 Operating Permit to incorporate the required operation conditions.

The source may begin construction and operation when the minor source modification has been issued. Operating conditions shall be incorporated into the Part 70 operating permit as a minor permit modification in accordance with 326 IAC 2-7-10.5(l)(2) and 326 IAC 2-7-12.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter call (800) 451-6027, press 0 and ask for Madhurima Moulik or extension 3-0868, or dial (317) 233-0868.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments

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cc: File - Jennings County
Jennings County Health Department
Air Compliance Section Inspector - Joe Foyst
Compliance Data Section - Karen Nowak
Administrative and Development
Technical Support and Modeling - Michele Boner

MINOR SOURCE MODIFICATION OFFICE OF AIR QUALITY

Erler Industries

**418 Stockwell Street, North Vernon, Indiana 47265
and
71 Hayden Pike, North Vernon, Indiana 47265**

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Second Minor Source Modification No.: 079-16237-00010

[Original signed by Paul Dubenetzky](#)
Issued by:
Paul Dubenetzky, Branch Chief
Office of Air Quality

Issuance Date: [September 5, 2002](#)

SECTION A

SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

The Permittee owns and operates a stationary operation which spray paints plastic and metal parts.

Responsible Official: J. Mark Erler
Source Address: 418 Stockwell Street, North Vernon, Indiana 47265
and 71 Hayden Pike, North Vernon, Indiana 47265
Mailing Address: PO Box 219, North Vernon, Indiana 47265
SIC Code: 3479
County Location: Jennings
County Status: Attainment for all criteria pollutants
Source Status: Part 70 Permit Program
Minor Source, under PSD;
Major Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-7-4(c)(3)] [326 IAC 2-7-5(15)]

This stationary source consists of the following emission units and pollution control devices:

- (1) One (1) paint line, identified as Plant 3, Line 4, consisting of three (3) spray booths, identified as EU-19, EU-20, and EU-21, with a maximum capacity of 625 parts per hour total, equipped with HVLP spray equipment, controlled by fabric filters, exhausting through stacks identified as SV-19, SV-20, and SV-21.

A.3 Specifically Regulated Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-7-4(c)] [326 IAC 2-7-5(15)]

This modification does not currently include any specifically regulated insignificant activities, as defined in 326 IAC 2-7-1(21).

A.4 Part 70 Permit Applicability [326 IAC 2-7-2]

This stationary operation which spray paints plastic and metal parts is required to have a Part 70 permit by 326 IAC 2-7-2 (Applicability) because:

- (a) It is a major source, as defined in 326 IAC 2-7-1(22);
- (b) It is a source in a source category designated by the United States Environmental Protection Agency (U.S. EPA) under 40 CFR 70.3 (Part 70 - Applicability).

SECTION D.1

FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

One (1) paint line, identified as Plant 3, Line 4, consisting of three (3) spray booths, identified as EU-19, EU-20, and EU-21, with a maximum capacity of 625 parts per hour total, equipped with HVLP spray equipment, controlled by fabric filters, exhausting through stacks identified as SV-19, SV-20, and SV-21.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

D.1.1 Volatile Organic Compounds (VOC) [326 IAC 2-7-10.5] [326 IAC 8-1-6]

The input VOC to the surface coating Line 4 (EU-19, EU-20, and EU-21) shall be limited to less than 25.0 tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period, with compliance determined at the end of each month. Compliance with this limit makes 326 IAC 8-1-6 not applicable.

D.1.2 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2, the surface coating operation at Plant 3, Line 4, shall follow the following work practices and control technologies:

Dry filters shall be in operation at all times that EU-19, EU-20, and EU-21 are in operation subject to the following:

- (1) The source shall operate the control device in accordance with manufacturer's specifications.
- (2) If overspray is visibly detected at the exhaust or accumulates on the ground, the source shall inspect the control device and do either of the following no later than four (4) hours after such observation:
 - (A) Repair control device so that no overspray is visibly detectable at the exhaust or accumulates on the ground.
 - (B) Operate equipment so that no overspray is visibly detectable at the exhaust or accumulates on the ground.

If overspray is visibly detected, the source shall maintain a record of the action taken as a result of the inspection, any repairs of the control device, or change in operations, so that no overspray is visibly detectable at the exhaust or accumulates on the ground. These records must be maintained for five (5) years.

D.1.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of

this permit, is required for the dry filters on Plant 3, Line 4.

Compliance Determination Requirements

D.1.4 Testing Requirements [326 IAC 2-7-6(1), (6)]

The Permittee is not required to test this facility by this permit. However, IDEM may require compliance testing at any specific time when necessary to determine if the facility is in compliance. If testing is required by IDEM, compliance with the VOC limit specified in Condition D.1.1 shall be determined by a performance test conducted in accordance with Section C - Performance Testing.

Erler Industries
North Vernon, Indiana
Permit Reviewer: Felicity L. Lao

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D.1.5 Volatile Organic Compounds (VOC)

Compliance with the VOC usage limitations contained in Condition D.1.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) using formulation data supplied by the coating manufacturer. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.1.6 Particulate Matter (PM)

The dry filters for PM control shall be in operation at all times when Plant 3, Line 4 is in operation.

D.1.7 Monitoring

- (a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks, SV-19, SV-20, and SV-21 while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.
- (c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.1.8 Record Keeping Requirements [326 IAC 2-7-6]

- (a) To document compliance with Condition D.1.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC usage limits and/or the VOC emission limits established in Condition D.1.1

- (1) The amount and VOC content of each coating material and solvent used. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used. Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents;
- (2) A log of the dates of use;
- (3) The cleanup solvent usage for each month;
- (4) The total VOC usage for each month; and
- (5) The weight of VOCs emitted for each compliance period.

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- (b) To document compliance with Condition D.1.7, the Permittee shall maintain a log of daily overspray observations, daily and weekly inspections, and those additional inspections prescribed by the Preventive Maintenance Plan.
- (c) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.1.9 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported.

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**INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR MANAGEMENT
COMPLIANCE DATA SECTION**

Part 70 Quarterly Report

Source Name: Erler Industries, Inc.
Source Address: 418 Stockwell Street, North Vernon, Indiana 47265
and 71 Hayden Pike, North Vernon, Indiana 47265
Mailing Address: PO Box 219, North Vernon, Indiana 47265
Part 70 Permit No.: 079-7572-00010
Facility: Plant 3/Line 4 (EU19, EU20, EU21)
Parameter: VOC
Limit: Less than 25.0 tons per year

YEAR: _____

Month	Column 1	Column 2	Column 1 + Column 2
	This Month	Previous 11 Months	12 Month Total
Month 1			
Month 2			
Month 3			

- 9 No deviation occurred in this quarter.
- 9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____
Title / Position: _____
Signature: _____
Date: _____
Phone: _____